

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

s.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**DEFENDANT'S  
UNOPPOSED MOTION TO  
EXCEED WORD LIMIT**

Defendant Board of Regents of the University of Nebraska ("BRUN"), pursuant to NECivR 7.1(d)(2), hereby moves the Court for an Order allowing them to exceed the limits of 6,500 words for their Reply Brief in support of Motion for Summary Judgment. In support, Defendant states:

1. In this case, there are two Plaintiffs, each with a Title IX, deliberate indifference claim, remaining. Each of the Plaintiffs present their own distinct and unique facts. During the course of discovery, the parties exchanged approximately 12,000 pages of documents and multiple audio recordings with hours of transcribed content.

2. Defendant's Motion for Summary Judgment asks this Court to dismiss all of the remaining claims with prejudice.

3. Defendant is preparing one Reply Brief in Support of the Motion for Summary Judgment addressing both Plaintiffs' claims and addressing various legal issues, including evidentiary issues.

4. Defendant requires the additional word count in order to address all material facts as it relates to the allegations of these two Plaintiffs.

5. Defendant's counsel contacted counsel for Plaintiffs on December 4, 2024. Plaintiffs' counsel does not object to this motion.

6. Accordingly, Defendant respectfully requests leave to file a Brief in excess of the 6,500 word limit, not to exceed 10,000 words.

WHEREFORE, Defendant respectfully requests that the Court grant its Motion to Exceed Word Limit, not to exceed 10,000 words.

DATED this 12th day of December, 2024.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA, Defendant

By: /s/ Lily Amare  
Susan K. Sapp #19121  
Lily Amare #25735  
Cline Williams Wright  
Johnson & Oldfather, L.L.P.  
1900 U.S. Bank Building  
233 South 13<sup>th</sup> Street  
Lincoln, NE 68508  
(402) 474-6900  
[ssapp@clnewilliams.com](mailto:ssapp@clnewilliams.com)  
[lamare@clnewilliams.com](mailto:lamare@clnewilliams.com)

AND

Bren H. Chambers, #23150  
Deputy General Counsel  
University of Nebraska  
3835 Holdrege Street  
Lincoln, NE 68583-0745  
(402) 472-1201  
[bchambers@nebraska.edu](mailto:bchambers@nebraska.edu)

**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Lily Amare  
Lily Amare